REMARKS

Claims 1-12 are pending. By this Response, claims 1, 3 and 5 are amended. Reconsideration and allowance based on the above amendments and following remarks are respectfully requested.

Applicants appreciate the indication of claims 2 and 4 as containing allowable subject matter.

The Office Action rejects claim 10 under 35 U.S.C. §112, first paragraph as failing to comply with the enablement requirement. This rejection is respectfully traversed.

Specifically, the Office Action alleges that the recitation of "accelerator is coupled to the CPU" in claim 10 is not described in the specification to enable one of ordinary skill to make or use the invention. Applicants respectfully disagree.

Applicants direct the Examiner's attention to page 10, lines 1-65, page 7, line 18, page 10, lines 19-21 and Fig. 3 which shows the relationship between the CPU and the anti-alias font generator. For example, on page 10, lines 5-6, the specification states that the anti-alias font generator 10 is realized by a hardware accelerator or the like". Therefore, the discussion of the anti-alias font generator refers to the hardware accelerator. One of ordinary skill would be able to ascertain based on the figures and description that the hardware accelerator is coupled to a CPU. In fact, this is clearly illustrated in Figs. 1, 3 and 5.

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Further, as stated MPEP §2164.01, any analysis of whether a particular claim is supported by the disclosure in an application requires a determination of whether that disclosure, when filed, contained sufficient information regarding the subject matter of the claims as to enable one skilled in the pertinent art to make and use the claimed invention. The standard for determining whether the specification meets the enablement requirement is provided in the Supreme Court decision of *Mineral Separation v. Hyde*, 242 U.S. 261, 270 (1916) which stated that the determination for meeting the enablement requirement is whether experimentation needed to practice the invention under undue or unreasonable.

Also, as stated in MPEP §2164.01(a), there are many factors to be considered when determining whether there is sufficient evidence to support a determination that a disclosure does not satisfy the enablement requirement and whether any necessary experimentation is "undue". These factors include, but are not limited to:

- (A) The breadth of the claims;
- (B) The nature of the invention;
- (C) The state of prior art;
- (D) The level of one of ordinary skill;
- (E) The level of predictability in the art;
- (F) The amount of direction provided by the inventor;
- (G) The existence of working examples; and

(H) The quantity of experimentation needed to make or use the invention based on the content of the disclosure.

Applicants respectfully submit that the Office Action fails to address any of the above factors. Thus, applicants respectfully submit that one of ordinary skill would not require experimentation that is undue or unreasonable in light of the specification to practice the invention.

In view of the above, applicants respectfully submit that the recitation of claim 10 is enabled by the specification. Accordingly, reconsideration and withdrawal of the rejection is respectfully requested.

The Office Action rejects claims 1, 3 and 5-12 under 35 U.S.C. §102(e) as being anticipated by Betrisey, et al. (U.S. 2001/0048764). This rejection is respectfully traversed.

Betrisey provides methods for improving resolution of images by using an overscaling or over sampling process. In the process of Betrisey, a random analytic blending coefficient is filtered using displaced filters. This generates an oversampled blending coefficient values. Color samples for each color are then determined based on the foreground and background and blend coefficient values. Therefore, Betrisey uses a blend coefficient value which is generated from an analytic blending coefficient which has been filtered to generate the oversampled blend coefficient value.

Thus, the blend coefficient value in Betrisey is not based upon gradation data held in a stipple buffer as in the present invention. In fact, Betrisey fails to

teach or suggest the use of any type of gradation values in conjunction with a blending coefficient. Further, it neither teaches nor suggests the use of a stipple buffer as evidenced from the system illustrated in Fig. 10. Although Betrisey provides various different memory devices, none of these memory devices are operatively connected to a blender and holding gradation value received from a CPU, as claimed in the present invention.

Therefore, Betrisey fails to teach each and every feature of claims 1, 3 and 5 as required under 35 U.S.C. §102 rejection. Specifically, Betrisey fails to teach or suggest a stipple buffer for holding gradation data of an anti-alias font transferred from a CPU to the stipple buffer, and a blender operatively connected to said stipple buffer and said source color register for blending a value of said source color register and a destination color value of a frame memory in accordance with a blend coefficient which is the gradation data held in a stipple buffer, as recited in claim 1.

Further, Betrisey fails to teach a blender operatively connected to said stipple buffer, said foreground color register and said background color register for blending a font display color of said foreground and color register into any background color of said background color register in accordance with a blend coefficient which the gradation data held in the stipple buffer, as recited in claim 3.

Finally, Betrisey fails to teach or suggest a plurality of display color registers for setting a display color on the basis of the gradation value of said anti-alias font

and a stippler color selector operatively connected to said stipple buffer and said plurality of display color registers for selecting a value of said plurality of display color registers in accordance with the gradation data held in the stipple buffer, as recited in claim 5.

In view of the above, applicants respectfully submit that Betrisey fails to teach each and every feature as recited in independent claims 1, 3 and 5. Accordingly, reconsideration and withdrawal of the rejection are respectfully requested.

Conclusion

For at least these reasons, it is respectfully submitted that claims 1, 3 and 5-12 are distinguishable over the cited patent. Favorable consideration and prompt allowance are earnestly solicited.

Should there be any outstanding matters that need to be resolved in the present application, the Examiner is respectfully requested to contact Chad J. Billings (Reg. No. 48,917) at the telephone number of the undersigned below, to conduct an interview in an effort to expedite prosecution in connection with the present application.

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If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Respectfully submitted,

BIRCH, STEWART, KOLASCH & BIRCH, LLP

Michael R. Cammarata, #39,491

MRC/CJB:cb 0054-0244P

Attachment(s)

P.O. Box 747

Falls Church, VA 22040-0747

(703) 205-8000